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 Attorneys for Plaintiff, Chanel, Inc.

THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

CHANEL, INC., a New York corporation,
 Plaintiff,

v.

CASONDRA TSHIMANGA a/k/a
 CASONDRA SMITH a/k/a CASONDRA
 SATCHER a/k/a C. MAYFIELD a/k/a ANNE
 LLOYD d/b/a HANDBAGOUTPOST.COM
 d/b/a DESIGNEROUTPOST.NET d/b/a
 HANDBAGSLUXURY.COM d/b/a BAY
 ELECTRONICS and Does 1-10,

Defendants.

Case No. C-07-3592-EMC

**DECLARATION OF KENNETH E.
 KELLER IN SUPPORT OF CHANEL,
 INC.'S MOTION FOR ENTRY OF
 DEFAULT JUDGMENT AGAINST
 CASONDRA TSHIMANGA**

Date:
Time:
Place:

I, Kenneth E. Keller, declare and state as follows:

1. I am an attorney duly licensed to practice law before the courts of the State of California and before this Court. I am a partner in the law firm of Krieg, Keller, Sloan, Reilley & Roman LLP, counsel of record for Plaintiff Chanel, Inc. ("Chanel"). The matters stated herein are true and correct of my own personal knowledge and, if called as a witness, I would testify

1 competently thereto.

2 2. I make this declaration in support of Chanel's Motion for Entry of Default and Final
3 Default Judgment against Defendant Casondra Tshimanga a/k/a Casondra Smith a/k/a Casondra
4 Satcher a/k/a C. Mayfield a/k/a Anne Lloyd. d/b/a HandbagOutpost.com d/b/a DesignerOutpost.net
5 d/b/a HandbagsLuxury.com d/b/a Bay Electronics ("Defendant").

6 **RE: ENTRY OF FINAL DEFAULT JUDGMENT**

7 3. On October 27, 2007, Defendant was served with a copy of the Summons, Complaint,
8 and supporting documents. A true and correct copy of the return of service is attached hereto as
9 Exhibit "1."

10 4. The time allowed for Defendant to respond to the Complaint pursuant to Federal Rule
11 of Civil Procedure 12(a)(1)(A) expired on November 16, 2007.

12 5. To my knowledge, Tshimanga is not in the military service and is neither an infant, nor
13 an incompetent.

14 6. To date, Defendant has not filed any responsive pleading to the Complaint, has not
15 requested an enlargement of time to respond to the Complaint, nor has any counsel made an
16 appearance on her behalf.

17 **RE: REQUEST FOR ATTORNEY'S FEES**

18 7. I have been an attorney for over twenty years and I have extensive litigation
19 experience. I have been handling trademark litigation matters throughout the course of my practice.

20 8. I began working on this action in July 2007, although the matter and investigation
21 were commenced by Chanel's Florida counsel, Stephen M. Gaffigan.

22 9. From July 2007 to the present, my firm invoiced Chanel a total of 32.90 hours. Total
23 fees charged to Chanel by this firm are \$11,770.00.

24 10. My hourly billing rate is \$500.00, which is either equal to or less than the prevailing or
25 comparable rate in the Northern District of California where this action was filed.

11. Some hours in this matter were discounted as a professional courtesy.

12. All attorney time incurred in this matter relates to the gathering of information, preparation of documents and pleadings, and other litigation related legal services. I made every reasonable effort to minimize hours spent on the case, and the fee requested is equal to or below the amount spent on similar past cases.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed the 12th day of March, 2008, at San Francisco, California.

_____/s/_____
Kenneth E. Keller